

DREW TULUMELLO (#196484)  
drew.tulumello@weil.com  
MARK A. PERRY (#212532)  
mark.perry@weil.com  
WEIL, GOTSHAL & MANGES LLP  
2001 M Street NW, Suite 600  
Washington, DC 20036  
Tel: 202 682 7000  
Fax: 202 857 0940

*Attorneys for Visa Inc.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L.; MG  
FREESITES, LTD; MINDGEEK USA  
INCORPORATED; MG PREMIUM  
LTD.; MG GLOBAL  
ENTERTAINMENT INC.; 9219-1568  
Quebec, Inc.; BERND BERGMAIR;  
FERAS ANTOON; DAVID TASSILLO;  
COREY URMAN; VISA INC.;  
REDWOOD CAPITAL  
MANAGEMENT, LLC ; REDWOOD  
DOE FUNDS 1-7 ; COLBECK  
CAPITAL MANAGEMENT, LLC;  
COLBECK DOE FUNDS 1-3,

Defendants.

Case No. 2:24-CV-04786-WLH-ADS

**NOTICE OF FILING VISA INC.'S  
SUPPLEMENTAL BRIEF IN  
SUPPORT OF VISA'S MOTIONS TO  
DISMISS**

Date: April 24, 2025

Time: 9:00 a.m.

Judicial Officer: Wesley L. Hsu

Courtroom: 9B

1 TO PLAINTIFFS AND ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, in accordance with Court Order, ECF No. 142,  
3 Visa filed a supplemental brief in support of Visa's motions to dismiss in *Fleites v.*  
4 *MindGeek, S.à.r.l., et al.*, Case No. 2:21-CV-04920-WLH-ADS (C.D. Cal. 2021).

5 Visa's supplemental brief covers claims brought by Plaintiffs against Visa in  
6 the following cases:

7 *Fleites v. MindGeek, S.à.r.l., et al.*, Case No. 2:21-cv-04920-WLH-ADS  
8 (C.D. Cal. June 17, 2021); *L.T. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04791-  
9 WLH-ADS (C.D. Cal. June 7, 2024); *N.L. v. MindGeek, S.à.r.l., et al.*, Case No.  
10 2:24-cv-04788-WLH-ADS (C.D. Cal. June 7, 2024); *N.Y. v. MindGeek, S.à.r.l., et*  
11 *al.*, Case No. 2:24-cv-04801-WLH-ADS (C.D. Cal. June 7, 2024); *T.C. v.*  
12 *MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04795-WLH-ADS (C.D. Cal. June 7,  
13 2024); *X.N. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04800-WLH-ADS (C.D.  
14 Cal. June 7, 2024); *J.C. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04971-WLH-  
15 ADS (C.D. Cal. June 12, 2024); *C.S. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-  
16 04992-WLH-ADS (C.D. Cal. June 13, 2024); *S.O. v. MindGeek, S.à.r.l., et al.*, Case  
17 No. 2:24-cv-04998-WLH-ADS (C.D. Cal. June 13, 2024); *W.L. v. MindGeek,*  
18 *S.à.r.l., et al.*, Case No. 2:24-cv-04977-WLH-ADS (C.D. Cal. June 13, 2024); *L.S.*  
19 *v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-05026-WLH-ADS (C.D. Cal. June  
20 14, 2024); *A.K. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-05190-WLH-ADS  
21 (C.D. Cal. June 20, 2024); *W.P. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-  
22 05185-WLH-ADS (C.D. Cal. June 20, 2024); and *J.L. v. MindGeek, S.à.r.l., et al.*,  
23 Case No. 2:24-cv-7046-WLH-ADS (C.D. Cal. Aug. 20, 2024).

1 Dated: March 21, 2025

RESPECTFULLY SUBMITTED,

2  
3 /s/ Drew Tulumello

DREW TULUMELLO (#196484)

drew.tulumello@weil.com

4 MARK A. PERRY (#212532)

5 mark.perry@weil.com

WEIL, GOTSHAL & MANGES LLP

6 2001 M Street NW, Suite 600

7 Washington, DC 20036

8 Tel: 202 682 7000

9 Fax: 202 857 0940

*Attorneys for Defendant Visa Inc.*